



8EHQ-0702-15173 MR 60801

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The Dow Chemical Company
Midland, Michigan 48674

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July 25, 2002

Contain NO CBI

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CONTAINS NO CONFIDENTIAL BUSINESS INFORMATION

Document Processing Center (TS-790)
Office of Toxic Substances
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue N.W.
Washington, D.C. 20460
Attn: 8(e) Coordinator

Re: Benzenesulfonic acid, hexadecyl(sulfophenoxy)-, disodium
salt CASRN 65143-89-7

Dear Sir/Madam:

The following information is being submitted by The Dow Chemical Company (Dow) pursuant to current guidance issued by EPA indicating EPA's interpretation of Section 8(e) of the Toxic Substances Control Act. Dow has made no determination as to whether a significant risk of injury to health or the environment is actually presented by the findings.

Twelve male and female (CD(SD)BR)rats per dose level were administered 0, 25, 100 and 500 mg/kg/day of the test substance by oral gavage.

Nine of the animals administered 500 mg/kg/day were dead or sacrificed by day 12 of the test. Observations included decreased activity, labored breathing, excessive salivation, body weight loss, pale mucous membranes and hemorrhagic changes in the stomach, mediastinum and various other tissues. Hematologic changes accompanying these hemorrhagic changes noted in these moribund male rats included increased prothrombin times and minor decreases in circulating levels of some hematologic components. Male rats given this high dose level that were euthanized early in a non-moribund state did not exhibit the hematologic effects described above for the moribund male rats.



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In female rats administered 500 mg/kg/day, adverse effects included excessive salivation and decreased body weight gain.

At the 100 mg/kg/day dosing level, one male rat became moribund and was terminated due to excessive bleeding from the orbital sinus following collection of an orbital sinus blood sample.

Excessive salivation was also noted in some rats dosed with either 100 or 25 mg/kg/day.

No written report of these results is yet available.

Sincerely,

A handwritten signature in cursive script, appearing to read "Linda C. Burgert".

Linda C. Burgert
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FAX: 989-638-9933
E-MAIL: lburgert@dow.com

jt